

# EXHIBIT B

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

DARREL K. THOMPSON, WILLIAM T. HOLT  
(deceased), LEATHA J. HOLT (deceased), and  
NEWAIR MANUFACTURING, LLC,

Plaintiffs

v.

MEDTRONIC, INC., MEDTRONIC PUBLIC  
LIMITED COMPANY, MEDTRONIC USA, INC.,  
STRYKER CORPORATION, PHYSIO-CONTROL  
INTERNATIONAL, INC., PHYSIO-CONTROL  
MANUFACTURING, INC., JOLIFE AB, and BAIN  
CAPITAL, INC.,

Defendants.

No. 2:19-cv-2038-JPM-tmp  
No. 2:16-cv-3013-JPM-egb

**Motion to Withdraw as Attorney of Record**

Comes now the undersigned attorney of record for the above-named defendant and moves to withdraw as counsel of record for the following reasons:

1. The client insists upon presenting a claim or defense that this attorney believes is not warranted under existing law and cannot be supported by good faith argument;
2. The client's conduct renders it unreasonably difficult for the lawyer to carry out his representation effectively; and,
3. Continuing representation would be an undue hardship on this attorney because by this Court's orders entered on November 3, 2020, the present actions were transferred to the United States District Court for the Western District of Michigan. (ECF 2:19-cv-2038 Doc. 65; and ECF

2:16-cv-3013 Doc. 70). This attorney is not admitted to practice in Michigan or in the United States District Court for the Western District of Michigan.

This attorney certifies that, pursuant to Local Rule 83.01(g), that he has given written notice to the Plaintiffs of his intention to withdraw at least fourteen (14) days prior to filing the motion to withdraw. (Exhibit A).

This attorney is of the opinion that the above-stated reason is compelling and that to allow this attorney to withdraw will not prejudice the client or the trial of this case.

Respectfully submitted,

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**Certificate of Service**

On this the \_\_\_\_ day of \_\_\_\_\_, 2020, I hereby certify that a copy of the foregoing has been served on all parties of record via operation of this Court's CM/ECF filing system.

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John Tennyson